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April 21, 2025

Via Electronic Case Filing

Honorable Jose R. Almonte
United States District Court, District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: Chang v. Able C&C Co. Ltd., Civil Action No. 23-cv-02590-KSH-JRA

Dear Judge Almonte:

This firm represents Defendant in the above-captioned matter. We write in response to the correspondence submitted by Plaintiff's counsel Mr. Lee "request[ing] leave to discuss the case with prospective attorneys to substitute in this action." (Dkt. No. 119). Defendant has grave concerns with Plaintiff and Mr. Lee sharing Defendant's privileged and confidential documents/information with potential new counsel. These concerns are amplified by the fact that Defendant does not have a full understanding of the privileged and confidential documents/information in Plaintiff and Mr. Lee's possession—and will not have such an understanding until Plaintiff and Mr. Lee satisfy the obligations set forth in the Court's April 17, 2025 Order. (*See* Dkt. No. 118). To ensure that privileged and confidential documents/information are not conveyed to new counsel, Defendant respectfully requests the Court direct Plaintiff, Mr. Lee, and new counsel (if and when new counsel is retained) to submit declarations, executed under the penalty of perjury, confirming that none of Defendant's privileged and confidential documents/information have been shared. Thank you.

Respectfully,

COLE SCHOTZ P.C.

/s/ Eric S. Latzer

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